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December 23, 2024

**Filed via ECF**

Magistrate Judge Anne Y. Shields  
United States District Court for the  
Eastern District of New York  
100 Federal Plaza, Courtroom 840  
Post Office Box 840  
Central Islip, New York 11722

Re: **Luis Alberto Ocampo and Carlos Jimenez, on behalf of  
themselves, individually, and on behalf of all others  
similarly-situated**  
Against: **Guaranteed Home Improvement LLC, and Justin Romano,  
individually, and Abraham Finkler, individually, and  
Ricardo Martinex, individually  
United States District Court  
Eastern District of New York  
Case: 2:24-cv-06980(AYS)**

Dear Magistrate Judge Shields:

Kindly be advised that this law firm has and continues to represent the Defendants in the above action.

On December 18, 2024, correspondence was filed seeking a Pre-Motion Conference prior to filing a dispositive motion in lieu of an Answer, pursuant to Fed. R. Civ. P. 12(b)(6).

The date by which the Defendants must Answer the Complaint or otherwise plead is Friday, December 27, 2024. Accordingly, we again seek the Court's instruction to preserve our clients' rights to so move and most certainly to avoid the possibility of the entry of default.

Respectfully submitted,

**LAW OFFICES OF PETER W. TILL**

*/s/ Peter W. Till*

Peter W. Till

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